

Appln. No.: 09/465,081
Amendment dated January 26, 2004
Reply to Office Action of August 25, 2003

REMARKS

The office action of August 25, 2003, has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested.

Claims 1-34 remain in this application. Claims 1, 8-13, 15, 17, 19, 21-26, 28, 30, 32, and 34 have been amended. Claims 1, 15, and 28 have been amended to more clearly recite the claimed invention. The remaining presently amended claims have only been amended to correct the spelling of a term.

Objection to the Declaration

The Examiner has objected to the declaration. Applicants submit under separate cover a revised declaration with the citizenship specified for the two inventors in question.

Interview of December 4, 2003

On December 4, 2003, the undersigned conducted an interview with Primary Examiner Bashore and Examiner Nguyen. The Examiners and the undersigned discussed the combination of references and the teachings of each. Because the examiner who issued the first and second office actions is no longer with the Patent Office, it is difficult to know exactly why the Examiner combined the selected references. While no agreement was reached, the undersigned suggested claim amendments to claim 1 for clarification.

Rejection of Claims under 35 USC 103 over Humplemen and Haverstock

Claims 1-17, 19, 21-28, 30, 32, and 34 stand rejected over the combination of Humplemen and Haverstock. Applicants traverse.

Claim 1 recites, *inter alia*:

"b) locating an alias within the link;

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- c) identifying a predefined system command associated with the alias; ...”

Applicants traverse the rejection as the combination as set forth by the Examiner does not teach or suggest the combination as currently claimed. The Examiner relies on Humplemen et al. to teach steps a, c and d. The Examiner notes that Humplemen et al. lacks the use of an alias as claimed. While the Examiner next relies on Haverstock, Haverstock is specific to how and why the alias (unique identifier, column 5, line 18, for example). Haverstock relates only to linking to other objects, not to a command as claimed.

Haverstock provides reasons why aliases are used with non-HTML files:

“This reduces the likelihood of receiving an error message indicating, for example, “File Not Found” produced by prior systems if a filename has changed. Prior systems retrieve files by filename and thus may be unable to locate a non-HTML object 18a because a system user has input a previous filename.”

These reasons do not relate to the system of Humplemen et al. For the Examiner’s combination of references to teach or suggest the combination of references, the references need to suggest the combination. Here, Humplemen and Haverstock are directed to two different issues: Humplemen to running macros on HTML files to operate TV and other devices; and Haverstock to assign alias to eliminate “file not found” errors for accessing non-HTML files. Here, Humplemen et al. does not suffer from “File Not Found” errors. The issue Haverstock attempts to address does not exist in Humplemen et al. The Examiner has presented two different references directed at two different goals and suggested it would have been obvious where there is no suggestion in the two references that suggest the combination.

Examiner’s reliance that a predefined system command must be present in Humplemen et al. for Humplemen et al. to function is misplaced. There are a variety of processes by which one may start system commands. For instance, Humplemen et al. uses predefined macro sets (see Figures 15 and 16). Macro sets are combined lists of instructions. There is no showing in Humplemen et al. of the claimed “predefined system command” that uses the alias information to execute the command. Accordingly, the independent claims are allowable over the combination.

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The Examiner asserts that the two references are in analogous arts. However, there is no teaching that combines the two as they both handled linking in divergent approaches. First, Humplemen addresses the ability to link directly to commands. Second, Haverstock addresses "file not found" errors when linking to files. These two different approaches linking to two different types of destinations (a control in one case and a file in the other) are not readily combinable as the Examiner suggests.

The Examiner asserts that one could be used in place of the other. However, the motivation provided in the references does not support the combination. For instance, the motivation to use the technique of Haverstock is to reduce the occurrence of "file not found" errors. However, this error is not present with commands to the extent shown by Haverstock. Rather, Humplemen appears to show a system with fixed links that should never encounter these errors (as opposed to a large database that may have file names appearing and disappearing constantly).

Accordingly, Applicants submit that the two references are not combinable and, even if combined, would not teach or suggest the combination as claimed.

Applicants petition for a two-month extension of time and have authorized Deposit Account No. 19-0733 be debited. It is believed that no additional fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

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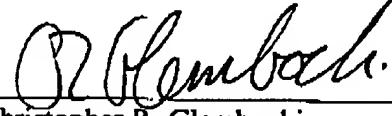
All rejections having been addressed, applicant respectfully submits that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same.

Respectfully submitted,

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Dated: January 26, 2004

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